

JMM:ALB
F. #2011R00746

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

Robert Lis,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

FRANK LOMONACO, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between November 2013 and the continuing to the present, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant Robert Lis, did knowingly violate the conditions of his release pending sentencing in the case United States v. Robert Lis, 12-CR-309(SJF), in that the defendant made false statements to a government official, in violation of Title 18, United States Code, Section 1001, while on release.

(Title 18, United States Code, Section 3148)

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ FEB 20 2014 ★

LONG ISLAND OFFICE

AFFIDAVIT IN SUPPORT OF
THE GOVERNMENT'S MOTION
TO REVOKE BAIL
(T. 18, U.S.C., § 3148)

Cr.: 12-309(SJF)

The source of Your deponent's information and the grounds for his belief are as follows:¹

INTRODUCTION AND BACKGROUND

1. Your deponent has personally conducted an investigation of the defendant Robert Lis. I have knowledge of the foregoing facts through my investigation, interviews of witnesses, review of documentary evidence, personal observation.

2. On November 29, 2012, following his plea to the indictment in this case, the defendant Robert Lis, was released on a \$1,000,000 bond, secured by the home of the defendant's father and mother. Among the additional conditions of defendant Lis's release was that he not commit any crimes while on release.

The Criminal Activity While Pending Sentencing

3. Based on my interviews of witnesses in this investigation, personal observation, review of documentary evidence, I have learned that the defendant Robert Lis has continued to engage in criminal activity since the entry of his guilty plea. I have learned that the defendant is engaged in hiding assets and omitting these assets in his financial affidavit and lying to government officials. As set forth more fully below, the defendant:

¹ Because the purpose of this Affidavit is to state only probable cause, I have not described all of the relevant facts and circumstances of which I am aware.

4. On November 17, 2013, the defendant Robert Lis wired \$2,500 by Western Union to Crystal Hernandez in Las Vegas, Nevada. Crystal Hernandez has a sports wagering account at the Venetian Casino in Las Vegas, Nevada.

5. On November 10, 2013, Robert Lis's girlfriend, Ashley Schenck, wired \$2,000 by Western Union to Crystal Hernandez in Las Vegas, Nevada.

6. On November 12, 2013, John Doe #1, whose identity is known to the United States Attorney, was arrested in Vernal, Utah, for transporting 180 pounds of marijuana. John Doe #1 had Robert Lis's telephone number, (516)413-8549, in his telephone. John Doe #1 told authorities that he had delivered marijuana to defendant Robert Lis in October and November 2013.

7. I have also learned that the defendant Robert Lis deposited cash into Crystal and Jeremy Hernandez's Wells Fargo checking account in Huntington, New York. The denomination of the cash deposits were \$20 dollar bills which, according to a bank teller, had a marijuana odor on them. The amount of the deposits ranged from \$4,000 to \$5,000.

8. Robert Lis deposited cash into Crystal and Jeremy Hernandez's Wells Fargo checking account in Greenvale, New York. The denomination of the cash deposits were mostly \$100 bills. The

defendant, Robert Lis told a Wells Fargo representative that he was
undergoing major renovations to his home in Nevada. The amount of
the deposits averaged approximately \$6,000.

9. On February 10, 2014, I interviewed Robert Lis and he denied knowing Crystal and Jeremy Hernandez. Furthermore, Robert Lis denied wiring any money to Crystal and Jeremy Hernandez. Robert Lis claimed that he does not have any cash and that he only has approximately \$25 in a checking account at People's United Bank.

WHEREFORE, Your deponent respectfully requests that an arrest warrant be issued for the defendant Robert Lis, so that he may be dealt with according to law.



Frank Lomonaco,
Special Agent
Federal Bureau of Investigation

Sworn to before me this
20th day of February, 2014



THE HONORABLE SANDRA J. FEUERSTEIN
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK